

TNagy.txt

From: tnagy@omni medi agrp. com%inter2 [tnagy@omni medi agrp. com] on behalf of tnagy@omni medi agrp. com
Sent: Monday, February 28, 2005 11:59 AM
To: Torres, Francine
Subject: Organic standards and access to pasture

Hello Ms. Torres,

I am writing to add my comments on the alarming re-defining of the "access to pasture" requirement for "Organic" products.

It has come to my attention that certain companies are loosely defining the "access to pasture" clause of Organic certification. That they are allowed to do this without any investigation or punishment, i.e. revoking their "Organic" label is a disaster. It undermines the entire effort of organic certification and labeling. If this practice continues truth in labeling will be suspect. The consumer who selectively pays extra money for organic produce and dairy expects certain measures to be upheld. That there is a respect for the animals and the environment evident in the processing and animal husbandry practiced in companies who label their goods "Organic" is one of the expectations the consumer has for their organic dairy and produce. It is for this purpose that the consumer is willing to pay extra money. To expand the definition of "access to pasture" brings the organic produce dangerously close to crossing the line to standard, non-organic factory farm produced dairy. At this line the labeling becomes a shield, a cloak to protect the company and not the consumer. Across this line the labeling is false and does not uphold the standards which the consumer has come to expect of the companies which label their products or dairy as "organic".

It would be great to have a system where the industry could police itself, would enforce its own standards on companies, or would be a deciding factor in whether a company could use the label "organic" or not. That time has not come. At this moment in our history the all mighty dollar is still the deciding factor. In the effort to "make products cheaper" companies have seen their way to bend rules, and obfuscate the truth of their practices.

It is now time to enforce on these companies a strict "access to pasture" definition which can not be loosely translated so as to seem dangerously close to factory farming methods. It is time to make this definition in line with the consumer's expectation - that better products and better milk and dairy come from the tending to the welfare of cows and other ruminants.

This includes access to pastures, fresh air and water, and other good husbandry standards. The public is more and more aware that this is better for all. We demand it of our organic produce and dairy, we recognize it as vital to the integrity of our food and our health, and we expect the USDA to uphold strict standards so that companies can not bend the rules and deceive us in their claims.

I firmly support the recommendations for the National Organic Standards Board Livestock Committee from February 1, regarding pasture requirements.

This requirement should not be dropped in any circumstance from the standards and should be vigorously enforced by the USDA. This is the only way to ensure the integrity of the "organic" label, to ensure the protection of the consumer from inscrupulous companies who would use our good intentions to their own means, and to protect the food supply from highly transmittable diseases and contaminants which can travel more easily when access to fresh air and pasture is not provided.

Please do not let this requirement be dropped, for the safety of the consumer as well as the integrity of our whole system.

Thank you for your time and consideration in this matter. This is of integral importance to me, and I hope that the USDA takes into consideration my letter, as well as the countless others whom my letter represents.

-Tracy Nagy
Ann Arbor, MI

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Tracy Nagy
Senior Multimedia Developer
Omni Media Group
734-761-8872
tnagy@omni medi agrp. com

www. omni medi agrp. com